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Cung Le, Nathan Quarry, and Jon Fitch*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

**Cung Le, Nathan Quarry, Jon Fitch, on behalf of
themselves and all others similarly situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

Case No. 5:14-cv-05484-EJD

**DECLARATION OF KEVIN E. RAYHILL IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO
CONSIDER RELATING CASES**

1 **Brandon Vera and Pablo Garza, on behalf of**
2 **themselves and all others similarly situated,**

3 **Plaintiffs,**

4 **v.**

5 **Zuffa, LLC, d/b/a Ultimate Fighting**
6 **Championship and UFC,**

7 **Defendant.**

Case No. 5:14-cv-05621-NC

8 I, Kevin E. Rayhill, declare and state as follows,

9 1. I am a member in good standing of the California State Bar and an associate at the Joseph
10 Saveri Law Firm, Inc. The Joseph Saveri Law Firm is counsel of record for the plaintiffs in both *Le et al. v.*
11 *Zuffa, LLC*, Case No. 5:14-cv-05484 (the “*Le* Action”), and *Vera et al. v. Zuffa, LLC*, Case No. 5:14-cv-
12 05621-NC (the “*Vera* Action”). I submit this Declaration in Support of Plaintiffs’ Administrative Motion
13 to Consider Whether Cases Should Be Related. I am over 18 years of age and have personal knowledge of
14 the facts stated in this Declaration. If called as a witness, I could and would testify competently to them.

15 2. On December 18, 2014, Defendant Zuffa, LLC “(Zuffa)” was served with a summons and
16 Complaint in the *Le* action. On December 29, 2014, Zuffa was served with the summons and Complaint
17 in the *Vera* action. No counsel has appeared for Zuffa in either case as of the date of this Declaration.
18 Accordingly, no stipulation regarding relating the cases could be reached with the Defendant.

19 3. Attached as Exhibit A is a true and correct copy of the complaint filed in *Le et al. v. Zuffa,*
20 *LLC*, Case No. 5:14-cv-05484-EJD.

21 4. Attached as Exhibit B is a true and correct copy of the complaint filed in *Vera et al. v. Zuffa,*
22 *LLC*, Case No. 5:14-cv-05621-NC.

23 5. Concurrently with the filing of Plaintiffs’ Administrative Motion, Zuffa will be served with
24 copies of the motion and all supporting documents concurrently filed with it.

CASE NO. 5:14-CV-05484-EJD, 5:14-CV-05621-NC